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Cylchlythyr | Circular

National measures for higher education performance (2)

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To: Heads of regulated institutions in Wales and other interested parties
Response by: 31 August 2018
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This circular provides a **second consultation** on developing performance measures for the higher education sector in Wales, building on circular W17/37HE.

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Introduction

1. This circular provides a second consultation on developing performance measures for the higher education sector in Wales, building on responses to consultation circular W17/37HE [National measures for higher education performance](#).

Background

2. HEFCW's previous [Corporate Strategy 2013-17](#) included seventeen sector-focused targets covering five strategic objectives and two enabling objectives in the Strategy (excluding organisational effectiveness, where we had our own group of measures). Under each strategic theme, we included one or more target outcomes and in addition, we noted aspects which we would monitor. **Annex A** sets out the previous targets and data we monitored.
3. Following consultation with the sector¹, HEFCW has agreed a new corporate strategy format focused on what we do: we fund; we regulate; we influence; we work in partnership with students; and we operate effectively. Given the reduction in funding drivers available to HEFCW, HEFCW was keen to move away from target outcomes for sector performance and to include only measures which we would monitor. As a result, we have now included twelve HEFCW performance outcomes in the Corporate Strategy, which received approval from the Cabinet Secretary for Education earlier this year.
4. In addition, we have included an objective to 'Develop measures by which to monitor the performance of higher education providers and monitor delivery'. Such measures would replace the seventeen targets included in the previous corporate strategy and would assist us in monitoring HEFCW regulated and/or funded HE providers in Wales.
5. This circular reports on an initial consultation with HE providers on the types of measures which could be used and the approach that HEFCW may take in utilising the measures and provides a more detailed consultation on a set of specific measures. Our aim is to develop a basket of measures in each key area which we will monitor and assess trends over time. Some will be in the public domain.
6. Since the closure of the consultation, the Welsh Government has published the outcome of the review of systems for monitoring and improving the effectiveness of post-compulsory education in Wales². In the report, Professor Harvey Weingarten has recommended that a performance instrument be developed that evaluates individual institutions and the PCET system as a whole in six domains which he identifies as reflecting the highest priority Welsh objectives. These are:

¹www.hefcw.ac.uk/documents/publications/circulars/circulars_2017/W17%2017HE%20Consultation%20on%20HEFCW%20Draft%20Corporate%20Strategy%202017-20.pdf

² <https://gov.wales/topics/educationandskills/highereducation/reviews/review-of-systems-for-monitoring-and-improving-the-effectiveness-of-post-compulsory-education-in-wales/?lang=en>

- Widening access to PCET education;
- Enhancing economic impact;
- Improving research and innovation;
- Maintaining sustainable institutions and systems;
- Learning value added; and
- The promotion of the Welsh language and culture.

We have assessed the proposals and take the view that the measures suggested below for higher education are not dissonant with these proposals for the whole Post-compulsory Education and Training (PCET) system. We look forward to working with the Welsh Government to develop appropriate measures for PCET, in the light of the vision and priorities for the PCET system as it develops.

Outcomes of the consultation

7. A summary of the outcomes of the initial consultation on measures is attached at **Annex B**. This includes specific points related to each of the areas of measures but also some general points. A summary of the general points is noted below.

- Some concerns were raised about the timing of the exercise, with changes to the Post-compulsory environment and the Weingarten review (and outcomes agreements); Higher Education Statistics Agency (HESA) Data Futures developments; changes to the Destinations of Leavers from HE (DLHE) and Longitudinal Educational Outcomes (LEO), and subject codes/HE Classification of Subjects (HECoS) etc. It was suggested that this should be a minor update rather than a major review.
- In light of this, most responses were keen to keep some continuity in the measures, with changes generally being suggested where current measures don't help or suit that particular institution.
- All responses favoured using existing sources of data at UK and Wales level, and keeping burden to a minimum.
- Many institutions noted that they had used the current targets in fee plans up to 2019/20 and would not wish to see changes before then.
- There was a wish to see measures reflect institutional diversity and keep benchmarking or other comparisons where possible.
- Institutions noted the need to bear in mind institutional autonomy and institutional Key Performance indicators (KPIs). Could we align to common areas of institutional KPIs?
- There was a suggestion that we look at trends rather than annual assessment.
- Some responses asked why we are proposing measures and not targets. The question was raised about how we can hold institutions to account without targets.

- There were a number of queries about the purpose of the measures: concern about their link to HEFCW's regulatory role and how they would work alongside the fee and access plan institutional targets; what would we publish; who are the audiences; relationship between individual institution and sector measures, etc.
- A need to recognise part-time and mature entrants in the development of measures was noted.
- There was a general wish to retain the five policy areas utilised in the consultation: Widening access and Inclusion; Student experience; Skills, employability and enterprise; Innovation and engagement; and Research, with queries about the use – and purpose – of using the Future Generations well-being objectives for higher education providers not subject to the Future Generations legislation.
- Most responses were content to leave out league table measures but there were references to the Teaching Excellence and Student Experience Framework (TEF); Research Excellence Framework (REF) and plans to develop a Knowledge Exchange Framework (KEF).
- All welcomed proposals to rationalise HEFCW processes for Strategic Planning and Engagement Documents (SPED), Fee and Access Plans and Institutional Risk Review (IRR) into one engagement if possible.
- Measures need to be in areas where the HE sector can reasonably influence the outcomes.

The measures - general

8. Taking account of these general steers, a set of measures is proposed which provides some continuity with previous target areas. These measures will be developed into 'baskets' or 'groups' covering the key areas consulted on previously. To provide a sense of forward direction in each area and to inform our monitoring and use of these measures with institutions, these 'baskets' have been re-framed as follows to indicate the outcomes sought in our monitoring:
 - A. Increasing Widening Access and Inclusion
 - B. Improving Student Experience
 - C. Strengthening Skills, Employability and Entrepreneurship
 - D. Broadening Innovation and Engagement
 - E. Increasing Internationally Excellent Research
 - F. Other measures
9. The detailed statistical definition of each measure has yet to be formulated and will be informed by this consultation. **Annex C** lists the suggested areas for measures and narrative below provides further explanation under the above headings A - F. We expect the baseline position to be 2016/17. Most of these areas follow the areas used in institutional KPIs, although the final measurement may suit national rather than institutional approaches. The measures build on suggestions from the consultation. In line with the consultation, we have not tried to align with published league tables.

10. Whilst the measures will be considered at both national and institutional level, the objective is to reflect Welsh Government priorities at national level and thus there will be flexibility for institutional diversity and autonomy within this to respond to areas of strength. However, we are seeking general improvement in these measures, whatever the institution's starting point, and for all regulated institutions to contribute in some way to each basket. Further information on how we propose to use the measures is given below, with cross references to the previous targets, as set out in Annex B.
11. At this stage it is proposed that performance is measured against the overall objective of HEFCW's vision for *Sustainable, accessible, internationally excellent higher education in Wales*. But we recognise that a new vision may emerge linked to the PCET developments which we will need to respond to. We also recognise that the report by Professor Weingarten, referred to above, will need to inform further approaches. It is likely, therefore, that these measures will be further developed over the period of the Corporate Strategy.
12. The principles used to select the measures take account of the consultation, as follows:
 - Maintain continuity with previous measures where this makes sense;
 - Utilise existing sources of data, particularly HESA, where possible, to minimise burden;
 - Select measures which can be applied to all or most HE providers in Wales;
 - Take account of the areas of institutional key performance indicators, where available;
 - Utilise benchmarked data or other comparative data where this is helpful;
 - Adopt measures where HE providers can reasonably influence the outcomes;
 - Recognise the extent to which measures are proxies (considering unintended consequences);
 - In monitoring, take account of trends in performance.

Q1. Do you have any comments on the general approach proposed?

The baskets of measures.

Basket A – Increasing Widening Access and Inclusion

- WIMD quintiles 1 and 2 (WIMD20 and WIMD40)
- UKPI for participation using POLAR and overlaid with mature
- Recruitment and Retention FT/PT and split by WIMD (both quintiles)
- Part-time recruitment (numbers and percentage against UK)
- Equality and Diversity student data

13. As suggested in the consultation, we propose replacing the existing Communities First/Welsh Index of Multiple Deprivation (WIMD) target with a geographical measure based on WIMD. We have considered ways of moving away from a geographical measure, which is a proxy for widening access, towards something based more on individual factors or, as recommended in the WISERD Report³, recruitment from schools with low numbers going to HE. However, we recognise that schools/other providers may prioritise progression routes other than HE and we are seeking measures of HE performance rather than school or other provider performance. We would also currently have difficulty in accessing schools' data. In the context of our all-age widening access agenda, we wish to ensure that adult learners remain crucial to HE provider recruitment.
14. In recognition of the success already experienced in increasing recruitment from the bottom quintile of WIMD, we propose a dual measure, following the example in Scotland which uses the SIMD, of WIMD20 (the bottom quintile) and WIMD40 (the fourth quintile), which will facilitate engagement by institutions in areas of Wales where there are less WIMD areas in the bottom quintile. Other UK HE funders retain geographically based widening access measures. This measure also responds to the Welsh Government's priority related to civic mission and assists in regenerating these geographical areas, rather than a less targeted approach.
15. We plan to encourage Reaching Wider partnerships to maintain their activities in WIMD areas, including WIMD20 and 40, but encouraging them to use those geographical areas as a mechanism for identifying harder to reach learners up to 16 and over 21, leaving institutions to focus their contribution to the Reaching Wider Programme on those closer to entry to HE and thus covered by fee and access planning or other investment.
16. We signalled in the consultation our intention to maintain the HESA UK Performance Indicator (UKPI) widening participation measures currently published by HESA and, specifically, that we propose to continue with our measure (T2), which overlays the POLAR young full-time participation measure with participation data on mature and part-time students to reflect our commitment to all-age widening access.
17. We currently measure both full-time and part-time retention using HESA UKPI aggregated data. This is a robust measure of retention in both the UKPIs and the TEF, and we propose to continue with this (T3). We also plan to disaggregate the retention data by WIMD20 and WIMD40 to place increased focus on the retention of widening access students. This measure covers both recruitment and retention.
18. In addition, under this heading we currently have a part-time measure (T4). The general steer in the consultation was to maintain the current UK comparative target but we will also need a measure of part-time numbers.

³ <https://wiserd.ac.uk/publications/access-higher-education-wales-report-higher-education-funding-council-wales>

Given Welsh Government priorities, we will want to maintain an emphasis on part-time recruitment, together with the monitoring of part-time fee levels (the latter is not a performance measure) and propose a measure of numbers and percentages in addition to the current target related to UK performance. We recognise that part-time numbers are also a key measure when considering the Student Experience and Skills, Employment and Enterprise policy areas.

19. HEFCW publishes equality data for students covering age, gender, disability and ethnicity⁴. This is not currently published at institutional level because there are small numbers in some categories at some institutions but we already monitor this through our Student Opportunity and Achievement Committee (SOAC). This does reflect the importance of inclusion in considering widening access to higher education and we propose to maintain that monitoring under the heading of 'Widening Access and Inclusion'. This will include monitoring male participation and disability. In terms of the latter, there is increasing concern regarding student mental health. This monitoring includes consideration of overall mental health issues (where declared)

Q2. Are these appropriate measures for the Increasing Widening Access and Inclusion basket?

Basket B - Improving Student Experience

- National Student Survey (NSS)
 - Welsh medium (5 and 40 credits, percentage and numbers)
 - Overseas students (numbers and percentage against UK)
 - Percentage of EU/international staff
 - Students taking up study experiences abroad (split by WIMD)
 - Transnational education (TNE) Students
 - Outcomes of external quality reviews
 - Office of the Independent Adjudicator (OIA) Complaints (total numbers, together with the numbers Justified/ partly justified/ settled)
20. There was general support in the consultation for continuation of the existing National Student Survey (NSS) measure and we propose to maintain the measure, which is monitored on a three year rolling basis against UK performance (T5). Some responses favoured breaking down the NSS outcomes by different elements (such as those selected in the TEF) but we are currently unable to access country benchmarks through that process and there is some institutional variation in which elements are prioritised. Our Quality Assessment Committee (QAC) already considers institutional data broken down by NSS question and raises issues with institutions, as appropriate.

⁴ www.hefcw.ac.uk/about_he_in_wales/statistics/equality_diversity_statistics.aspx

21. As part of our corporate strategy objective to work in partnership with students, we want to include measures which reflect the student voice, which is increasingly important in higher education in Wales. The NSS reflects student satisfaction, including in relation to the student union. The student voice is also integrated into the governing body quality assurance statement. We are remitted to place a particular focus on NSS outcomes related to student voice and assessment and feedback and we will continue to consider performance in these areas. We would welcome views on whether these two aspects should be foregrounded in our monitoring.
22. We also propose maintaining the measures of Welsh medium provision using those studying 5 or more credits and 40 or more credits, which aligns with Coleg Cymraeg Cenedlaethol Scholarships (which also cover 80 credits) (T6). We plan to retain these measures at this stage pending Coleg developments. We also recognise the importance placed in the Weingarten report on promoting Welsh language and culture and will consider how appropriate measures can be developed. We would welcome views on this, particularly noting the alignment with the priority on civic mission. Some have raised with us whether 10 credits would be a more appropriate measure than 5 credits and we would welcome views on that. As noted in the previous consultation, Welsh Government is undertaking work on data linking between PLASC⁵, LLWR⁶ and HESA datasets (covering schools, FE/Work Based Learning and HE) which may contribute to further monitoring of Welsh medium progression.
23. We propose to retain a measure of overseas student recruitment, including percentage annual change, which is comparative to the UK (T7). However, we also propose to monitor overseas student numbers in order to track movement, particularly in the context of withdrawal from the European Union. We also propose measuring the percentage of EU/International staff, looking at trend data over the next few years and as a measure of the attractiveness of institutions to overseas staff.
24. It is also becoming increasingly important to monitor outward mobility experiences, as this is becoming a more explicit part of the offer available to students. Monitoring is particularly important in relation to widening access groups, which may have more barriers to accessing these experiences. We therefore propose a new measure of outward mobility, which will also break down figures by WIMD20 and WIMD40. In considering proposals, SOAC advised that this measure could work against the involvement of widening access students, and we would welcome views or concerns related to that point.
25. We have been undertaking further work to measure Transnational Education (TNE) students (ie those studying overseas with Welsh HEIs). We could include a measure for this using the HESA aggregate offshore record (numbers by country, level of provision, type of activity (registered at provider:

⁵ Pupil Level Annual School Census

⁶ Lifelong Learning Wales Record

studied overseas at overseas campus, not at overseas campus, distance/flexible/distributed learning but student overseas; registered at partner overseas; other), by institution) and would welcome views on how best to measure this.⁷

26. For quality, there was general agreement in the consultation that we should continue to use the outcome of the external quality assurance reviews in HE as the appropriate measure. We will also expect to measure quality using a range of student data which informs our Quality Assessment Framework⁸ and Institutional Risk Review process. Again, consultation responses were generally supportive of approaches which aligned with the previous HEFCE Annual Provider Review approach and also improving alignment between HEFCW processes. We are continuing to work on that.
27. We annually monitor complaints to the Office of the Independent Adjudicator (OIA) made against Welsh institutions through reports to our Quality Assessment Committee, using the OIA's annual report and annual statements which are in the public domain. We propose a new measure related to OIA complaints. There was general agreement in the consultation to that proposal.
28. We note Professor Weingarten's recommendation that 'learning value added' should be one of the six domains for the performance instrument for PCET. We have been considering the work funded by HEFCE on Learning Gain, including with SOAC, and look forward to working with Welsh Government and institutions to consider measures to address that recommendation.
29. As noted above, we consider recruitment and retention from the perspective of all students as well as WIMD cohorts.
30. In line with advice from Welsh Government, we will be monitoring part-time and postgraduate fee levels, as referenced in the 'basket of goods' consultation. Full-time undergraduate fees are monitored as part of the fee and access planning process. We will be monitoring these separately in accordance with our remit and statutory responsibilities; we do not see fee levels as a measure of higher education performance.
31. We do not plan direct alignment with the TEF in our measures. Whilst recognising that most universities in Wales are part of the TEF, this is an English exercise which is optional to providers in Wales. Nevertheless we will keep abreast of changes to TEF measures, including new areas such as grade inflation and teaching intensity.

Q3. Are these appropriate measures for the Improving Student Experience basket?

⁷ www.hesa.ac.uk/collection/c16052

⁸ www.hefcw.ac.uk/policy_areas/learning_and_teaching/qa_fa_wa.aspx

Strengthening Skills, Employability and Enterprise

- Employment
 - Graduate Employment
 - Higher Education – Business and Community Interaction (HE-BCI) Survey – Continuing Professional Development (CPD) measure
32. As indicated in the consultation, previous corporate strategy targets use the Destinations of Leavers from Higher Education (DLHE) data for employment (percentage in jobs or further study) and graduate employment (percentage in graduate occupations). However, the DLHE survey will be ending in 2016/17 and changing to a new Graduate Outcomes Survey (GOS). The first GOS will be launched in December 2018 with the outcomes published spring 2020, so there will be a gap between the 2016/17 cohort data and the 2017/18 GOS cohort data being published. Nevertheless, we do wish to retain measures of employability and graduate employment. We will retain the current measures (T10 and T11) at this stage, renaming them to better reflect their purpose. Consultation responses were not favourable to the use of Longitudinal Educational Outcomes (LEO) data within the measures and we do not propose to use those data, although we recognise that institutions will monitor this.
33. Given the nature of the Welsh economy, there may be value in attempting to differentiate, engagement with small and medium sized enterprises (SMEs) and engagement with other industry in our monitoring, and we would welcome views on that proposal. We do not propose specific measures related to engagement with Regional Skills Partnerships but will monitor this engagement in more qualitative ways, including, potentially, through commissioned research.
34. The HE-BCI Survey measures the extent of CPD take up in each institution. This was a target in our previous Corporate Strategy (T12). There were mixed views about this measure in consultation responses. However, it does provide an indication of the extent of HEI engagement with employers and we propose to continue to use this measure.
35. We propose a measure of degree apprenticeships but will be unable to determine such a measure until there is broader funding and involvement in this type of learning at degree level. In the meantime, we will monitor degree apprenticeships using the HESA student record initiatives field, which will flag whether a student is studying as part of a degree apprenticeship from 2018/19. This will supplement data which we will collect about HEFCW-funded degree apprenticeships, once these have commenced. This is a developing area and we would welcome views on what sort of measures could be used.
36. We would similarly like to measure work experience and placements. It is possible to identify sandwich year placements at present using HESA data,

and the new HESA student record from 2019/20 will include additional information about work placements. This is a developing area.

37. As noted previously, it will also be important to include a measure of part-time learning under this heading, as this covers upskilling provision.
38. We have noted the performance indicators proposed to support the delivery of the Well-being of Future Generations goals.⁹ Higher education feeds into these, particularly those related to the percentage of adults with qualifications at the different levels of the National Qualifications Framework and the percentage of people in education, employment, or training, measured for different age groups. However, we do not consider these to directly measure higher education performance in Wales.

Q4. Are these appropriate measures for the Strengthening Skills, Employability and Entrepreneurship basket?

Basket D - Broadening Innovation and Engagement

- From the HE – Business and Community Interaction (HE-BCI) Survey:
 - Total income (collaborative research, consultancy, contract research, CPD, facilities and equipment-related services, IP, regeneration and development);
 - Spin outs: new spin-outs and spin-outs still active which have survived at least three years; and
 - Start-ups (staff and graduate): new start-ups; and start-ups still active which have survived at least three years.
 - REF impact outcomes
 - Industrial Strategy Challenge Fund outcomes
39. One of the objectives in the Welsh Government's National Strategy *Prosperity for All*¹⁰ is to 'focus business support schemes on building an entrepreneurial culture in Wales, and establish targets for the numbers of school, college and university leavers starting companies, as well as targets for their sustainability and growth'. 'Start-ups' can be used to measure how individuals apply their enterprise skills to build new businesses, additionally they can also measure the health of an innovative economy¹¹. Some suggestions were made in the consultation for other measures of enterprise, such as engagement with the Welsh Government's Youth Entrepreneurship Programme but, on investigation, these measures did not cover all HE providers and comprehensive data was not available.

⁹ <http://gov.wales/topics/people-and-communities/people/future-generations-act/national-indicators/?lang=en>

¹⁰ <http://gov.wales/docs/strategies/170919-prosperity-for-all-en.pdf>

¹¹ www.qaa.ac.uk/docs/qaa/about-us/enterprise-and-entrepreneurship-education-2018.pdf?sfvrsn=20e2f581_10

40. The Review of Government Funded Research and Innovation in Wales (the Reid Review)¹² identifies three areas to be measured in relation to innovation and engagement:

- Further increases to the scale of business collaboration with universities in Wales;
- Further increases in university collaboration with public sector bodies;
- The attraction to Wales of collaborators from business, charities and public sector bodies elsewhere.

These areas are already largely covered within our routine monitoring of HE-BCI indicators. The broad range of HE-BCI survey indicators continues to be of interest and we will continue to use these to monitor sector performance on an annual basis. We will further develop our monitoring in these areas once we are in a position to reintroduce funding for innovation and engagement.

41. Taking the policy steers above into account, in addition to our routine annual monitoring of HE-BCI outcomes, we propose to distil the HE-BCI measures down to: (i) total HE-BCI income; and (ii) total numbers of spin-outs (HEIs) and start-ups (staff and graduates), both new and those surviving for three years. As suggested by the consultation responses, we also propose to add REF impact outcomes to the list of measures. We also note the steers in the consultation responses that we should take account of proposals for a Knowledge Exchange Framework (KEF). We will retain the flexibility to align with any new measures that that emerge from the KEF process being developed by Research England.
42. A further consideration relates to income derived from Industrial Strategy Challenge Fund sources¹³. The Industrial Strategy Challenge Fund aims to bring together the UK's world-leading research with business to meet the major industrial and societal challenges of our time. By investing in and supporting UK businesses and researchers, the Fund will ensure that research and innovation takes centre-stage in the UK Government's [Industrial Strategy](#). We would welcome your views on the inclusion of Industrial Strategy Challenge Fund outcomes as a measure of performance. We would probably need to obtain this data direct from UKRI as consolidated data is not currently available in the public domain.

Q5. Are these appropriate measures for the Broadening Innovation and Engagement basket?

Increasing Internationally Excellent Research

- Number of researchers (ie staff on research and research & teaching contracts) – STEM and non-STEM
- Postgraduate Research (PGR) student numbers

¹² <https://gov.wales/topics/science-and-technology/science/reid-review/?lang=en>

¹³ www.gov.uk/government/collections/industrial-strategy-challenge-fund-joint-research-and-innovation

- Numbers of PhDs awarded
 - PhD completion rates (proportion completing within four years for full-time students, and the equivalent for part-time)
 - Research income (Research Council and total)
 - Bibliometric indicators (HEFCW to commission data periodically from specialist consultants)
 - REF outcomes.
43. Our current target relates to Research Council income by institution plus comparator with UK (current measures on basis of UK minus 'golden triangle' (T14)). We also have a measure related to the REF which has been met (T15). However, our Research, Innovation and Engagement Committee (RIEC) has considered in some detail the issue of measures of research and favour a basket of measures. There was general support for the proposed basket of indicators in the responses to the consultation, with a few points of query, including whether these favour larger institutions.
44. As was suggested in the consultation responses, we have added REF outcomes to the proposed list of measures. We have also added a measure on PhD completion rates on the advice of our Quality Assessment Committee. However, in the light of the consultation responses, we have also removed a number of the measures initially proposed, as they would have required additional data collection. For most of the proposed measures, we intend to use time-series in order to be able to identify trends.

Q6. Are these appropriate measures for the Increasing Internationally Excellent Research basket?

Other measures

45. Our previous consultation (W17/37HE) scoped the different areas of information available in higher education. We will continue to make use of those data to inform our work. This includes the data which informed the HEFCE Annual Provider Review (APR) (listed in our consultation circular), which covered quality as well as financial sustainability. Consultation responses were largely content that we should utilise those data and we have taken account of those views in forming our proposals, including as we review our approach to Institutional Risk Review, Fee and Access Plans and Strategic Planning and Engagement Documents.
46. We publish annually an analysis of the financial health of the HE sector, which includes a range of financial ratios and measures¹⁴. We will continue to monitor and publish data in these areas, with a particular interest in trends. We note Professor Weingarten's recommendation that 'Maintaining sustainable institutions and system' should be one of the six domains for the

¹⁴www.hefcw.ac.uk/documents/publications/circulars/circulars_2016/W16%2002HE%20Analysis%20of%20the%20financial%20position%20of%20the%20HE%20sector%202013_14.pdf

performance instrument for PCET, and look forward to working with Welsh Government and institutions to consider measures to address that recommendation.

47. Estate Management Statistics (EMS) are published at UK level, including carbon efficiency measures. Objectives related to carbon efficiency and decarbonisation of public services are included in the national strategy, *Prosperity for All*. Although EMS are not generally HE performance measures, we will continue to monitor in this area, particularly in relation to carbon efficiency performance.
48. We publish information annually on senior salaries and will continue to do this.¹⁵ This is a developing area and now includes information on the gender pay gap.

We are also interested in major prizes awarded and other indicators of international reputation and esteem. We will continue to collect this information and disseminate through case study and other publications.

49. Data on equality and diversity related to staff in institutions is collected by HESA. We continue to monitor these data in relation to our Strategic Equality Plan. We publish data on our website in these areas.¹⁶

Q8. Are these appropriate other measures?

How measures might be used

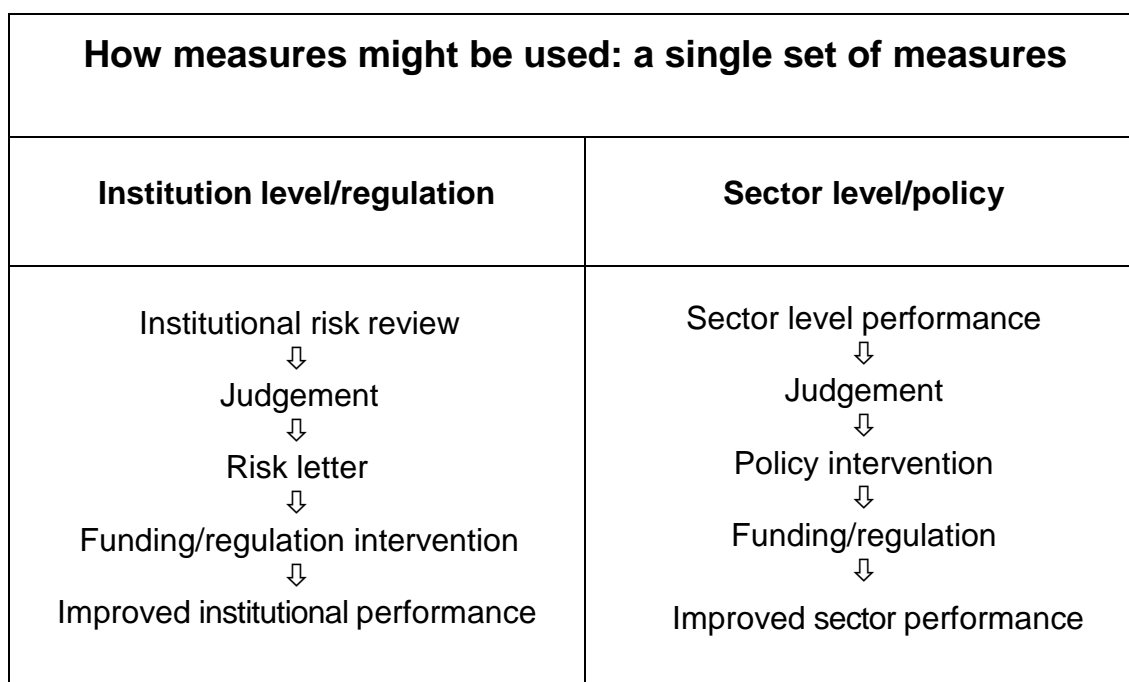
50. A number of responses queried how the measures might be used, particularly in the context of HEFCW's regulatory role. This issue was discussed in some detail in the consultation and Council have considered this matter further. The following uses are proposed.
 - Monitoring sector performance against priority areas, including annual reports to HEFCW Council;
 - Monitoring individual institutional performance against priority areas, including informing quality assessments (eg provision likely to become inadequate) and institutional risk assessments;
 - Publication of some measures, some annually, at both institutional and sector level;
 - Informing institutional fee and access planning;
 - Policy development.
51. Once identified, we expect institutions to take the measures into account when considering the areas they monitor. Our review of our monitoring methods (eg Institutional Risk Review, Fee and Access Planning, Strategic

¹⁵www.hefcw.ac.uk/documents/publications/hefcw_reports_and_statistics/HEFCW%20Senior%20Staff%20Pay%202015-16.pdf

¹⁶www.hefcw.ac.uk/about_us/equality_and_diversity_in_hefcw/equality_diversity_statistics.aspx

Planning and Engagement Document (SPED)), will also be informed by the measures. Given the changing environment, it is likely that the measures will be further developed during the period of the Corporate Strategy.

52. Once established, the same measures might be used to inform both institutional level action and sector level intervention. The following diagram sets out how the information might be used:



Q9. Have you any comments on how we will use the measures?

Further information / responses to

53. For further information, contact Celia Hunt (tel 029 2085 9730; email celia.hunt@hefcw.ac.uk).

Assessing the impact of our policies

54. We will carry out an impact assessment screening to help safeguard against discrimination and promote equality once measures have been developed. We will also consider the impact of policies on the Welsh language, and Welsh language provision within the HE sector in Wales, and potential impacts towards the goals set out in the Well-Being of Future Generations (Wales) Act 2015 including our Well-Being Objectives. Contact equality@hefcw.ac.uk for more information about impact assessments.

National Measures for higher education performance (W17/37HE) – summary of consultation outcomes by question

Q1 Do you have any other general comments on the issue of developing sector measures?

Key points:

- Welcome ongoing review of the measures to ensure they are fit for purpose and engagement with wider UK data developments.
- Welcome move to measures rather than targets, recognising that institutions will set their own targets.
- Some institutions expressed concern about having measures without targets. How to monitor, benchmark and take remedial action if required. How could FAP/SPED work. How would HEFCW hold institutions to account?
- HEFCW needs to be clearer about the intended purpose and use of the indicators.
- Need to consider how this information is used, particularly in context of messages to prospective students and potential lenders.
- Tension about recording basket of measures at sector level and then potentially using those same measures to inform institutional interventions. Query whether one set of measures can meet regulatory and strategic functions. For institution level, should include benchmarking or UK comparability.
- Measures should be generalizable, strategic and high level.
- Measures should be consistent with UK measures where possible to aid comparability, noting some difficulties re part-time.
- Need to ensure behaviours driven by the measures are the correct ones
- Concern about timing of this review, given PCET developments, Post-18 Review in England, school curriculum changes, data landscape changes, etc.
- Suggest existing measures should be refined or updated. Where previous targets were effective, should include some measure of continuity.
- Note proposals to introduce outcome agreements and Weingarten Review. Some responses welcomed introduction of outcome agreements.
- Preference for trend lines rather than annual assessment, alternatively rolling multiple year averages published alongside annual measures
- Some support for using data from TEF measures, where applicable. TEF mentioned as a good high level indicator – shows how a basket of measures can facilitate an overall opinion of performance.
- Helpful to use this opportunity to rationalise similar information in fee and access plans (FAP) and strategic planning and engagement document (SPED).
- HEFCE Annual Provider Review processes might be helpful.
- Measures should be in areas which the sector can reasonably influence.

- Basket of measures approach gives more rounded view of performance.
- Need to protect institutional autonomy and allow for institutional diversity in terms of strengths and priority areas.
- Not supportive of aligning with league tables (only one response in favour)
- Not all measures are quantitative. Case studies might be helpful.
- Welcome for further consultation on smaller set of specific measures. Suggest a workshop for further discussion.
- Need to consider how straightforward the measures will be to monitor and collect and the timing of introduction.
- Any new measures should not be burdensome for institutions. Should be aspects routinely collected by HEI (eg HESA) or already in the public domain; align with institutions' own measures; and have clear definition.
- Need to recognise that existing measures will continue to be included in FAPS to 2019/20.
- Query whether equalities and Welsh language objectives can be captured in measures: these are more detailed than required for strategic objectives and statutory responsibilities fall on institutions.
- Future Generations legislation falls on HEFCW but not on institutions.
- Unclear in circular how much would be monitored and how much published.
- General support for retaining current themes, less support for moving to place measures under HEFCW's three well-being objectives.

Q2 Do you have any further comments on other considerations we need to take into account?

Key points

- Need to take account of institutions KPIs as there should be commonality.
- Measures need to be consistent with those used in other sector initiatives (TEF, Unistats, etc).
- Need to bear in mind institutional KPIs.
- It should not be assumed that improvements can be made across each individual measure. Need to reflect the diversity and current operating environments of each HE provider.
- Need to be flexible to respond to new initiatives such as the Knowledge Exchange Framework (KEF)
- Need to ensure that development of measures does not discourage collaborative working – suggest looking at Scottish practice.
- Need to be clearer about how the measures will be used in context of HEFCW's regulatory role.

Q3 What should we measure in the context of widening access and how?

- Any measures need to recognise that Widening Access (WA) is a long term activity.

- Suggest baskets for a range of student characteristics for 'priority' and 'non-priority' students.
- Continue with location based measures as these enable initiatives with long lead in times. General support for geographical measures using postcode data.
- UK performance indicators based on POLAR data. This was generally supported as a long established measure. Suggestion to include indicator for (Welsh domiciled) mature and part-time entrants
- General support for use of Welsh Index of Multiple Deprivation (WIMD), which provides robust historical comparability and breaks down to low super output areas (LSOAs) within wards but noting that this is not comparable to UK.
- Could align with Future Generations measures, using household data, eg % living in households in income poverty; % living in households in material deprivation. Other responses advised caution on household income measures.
- Note HEFCE participation maps, which provide information on broader issues.
- Retention should be measured (recognising that some widening access groups pose issues for retention and are therefore higher cost)
- General support for part-time measure. However, it was suggested that part-time is not homogenous and may need a broader range of measures. Also need to reflect flexible learning and adult learners. One response queried comparisons with England where there are different funding arrangements.
- Explore linkage of data with schools and FE in relation to progression. Could also look at measures of school quality (eg where performance at KS5 falls below national UK average across multiple years). State school marker is less relevant in Wales. Partnership working with schools should be encouraged.
- A measure of Care experienced and young adult carers should be retained.
- Suggest more sophisticated analysis covering intersectionality, reflecting work by ECU. Note that universities do not have access to all protected characteristics data and that rural institutions tend to be less diverse.
- Suggest measures around activities with schools with low levels of pupils going to HE (WISERD recommendation)
- Some support for Free School Meals data or Education maintenance allowance (EMA) data (including using closest school for adult learners or in receipt of state benefit) but concerns re part-time and mature learners generally.
- First in family to HE, or income measures can be helpful.
- Query about how to measure access to the professions. Although some measure of accredited courses might be helpful.
- Query about use of Disabled Students' Allowance data as this only reflects those who have been successful in applying for the DSA.
- Agree that HE initial participation rate is a measure of school performance.
- Welcome work to improve evaluation and monitoring of the impact of WA activities.

Q4 What should we measure in the context of Student Experience and how?

- General support for National Student Survey (NSS) measure (which is consistent with some Future Generations measures). But recognise difficulties for part-time. Some suggestions about breaking down the NSS questions (eg using those used in TEF or those on student voice).
- Some concerns raised about use of TEF measures, particularly the use of measures which are currently being piloted.
- Postgraduate teaching/research experience surveys (conducted by the Higher Education Academy) could be mandated across the sector.
- Maintain Welsh medium measures, plus could include a measure of numbers of Welsh speakers (although a question raised about whether these data always correlate with those taking up provision) or percentage of Welsh domiciled population.
- For overseas recruitment the existing measure against UK trends is helpful. May need to break down numbers within EU and outside of EU. Need to retain an understanding of overseas recruitment of students and staff. Trans-national education data may not be sufficiently robust and does not measure student experience. Preferable to focus on quality.
- General agreement on retention of measure on external quality reviews.
- Suggest academic teaching qualifications, although one response suggest that this is an input and we should focus on outcomes.
- Subjects of a broader importance to Wales should only be measured when there is funding to support sustainability. One institution supportive of STEM measure.
- Some support for a measure of outward mobility and that this should include a breakdown by widening access/protected characteristic group. One institution suggested that this should be preferably at subject level.
- Monitoring of complaints to institutions gained some support but should be only complaints which are justified, broken down by percentage of the population. This could be enhanced by identifying the range of issues by theme.
- General view that the HEFCW 'basket of goods' work does not measure performance. Similarly note monitoring of full-time and part-time fees.
- Agree with removal of ITT target measure.
- Noted need to include franchise arrangements within the measures.
- Attention was drawn to the HEFCE work on learning gain, which could provide new measures.

Q5 What should we measure in the context of Skills, Employability and Entrepreneurship and how?

- Need to recognise ending of existing Destinations of Leavers from Higher Education (DLHE) data and replacement with new Graduate Outcomes Survey (GOS) with a year's gap. General support for the use of DLHE/GOS measures as in the UKPIs. Consider looking at responses to GOS consultation in terms

of possible measures. Could breakdown these data by protected characteristics.

- Strong concerns about use of DfE Longitudinal Outcomes Data (LEO), as being experimental. Including need for benchmark and contextual information such as a weighting to account for higher salaries in London/SE.
- Could target percentage of graduates in particular professions retained in Wales.
- Some support for work placement measures, but also concerns that these are not homogenous and therefore difficult to measure.
- Note that institutions already report to Welsh Government on measures related to the Youth Entrepreneurship Strategy, eg numbers of young people participating in idea developments/number of 1:1 meetings to equip young people.
- Suggested measuring completed hours of credit bearing work-based learning by region and by industry.
- Measure meaningful engagement with employers via curriculum design and ongoing input into curriculum development.
- Benchmark HEI performance against key skills for the economy
- Consider a value added measure to show distance travelled.
- Important to recognise that part-time students are already in work.
- Should measure student skills development: numbers involved in placement/internship programmes; Boot campus type activity; student competitions; enterprise activities using measures from the Higher Education-Business Community Interaction Survey (HE-BCI) eg CPD courses. Something to capture the process of preparing students for employment, not just the outcomes.
- Measurement of professional accreditation of courses. Recognise that sandwich placements only cover full-time undergraduate students.
- Agreement with development of a measure for higher and degree levels apprenticeships linked to HESA.
- Other possible measures: employability strategic interventions; HEFCW to develop Framework for Employability; careers readiness; learning gain; number of programmes which embed enterprise.
- Some crossover with measures suggested for innovation and engagement.

Q6 What should we measure in the context of innovation and engagement and how?

- General support for the use of Higher Education – Business Community Interaction Survey measures, recognising some issues with definitions. One response suggested awaiting the outcomes of the HE-BCI review. Some responses identified the need to be flexible to take account of the proposals in England for a new Knowledge Exchange Framework (KEF).

- Some concern about the breakdown of HE-BCI measures, for example using the Continuing Professional Development (CPD) measure, as this provision is not homogenous.
- Some support for separating graduate start-ups (recognising that this is a Welsh Government priority). Other support for contract research/consultation, and facilities/equipment, IP and Spinout analysis, Start-ups beyond recent graduates
- Note that patents filed can be misleading as it is not patents granted or indicative of their being taken forward. Suggest other IP data that requires registration, trademarks or design rights with an indicative figure for copyright. For creative industries, copyright might be the best indicator.
- Several responses noted that HE-BCI does not effectively measure impact: consideration should be given to getting direct feedback from partners and recipients and/or other measures eg strategic partnership; industry input into curriculum; placements.
- Some support for the use of Knowledge Teaching Partnership (KTPs) measures but other responses noting that this is not measured separately within HE-BCI and would need to be collected additionally.
- Other suggestions included number of academics involved in enterprise/industrial contracts; number of academics winning entrepreneurship/innovation competitions; industrial engagement profile with SMEs/large organisations; income from industrial strategy related programmes; return of investment on university innovation schemes; number of projects/events and feedback opportunities which the university participates in; EU funding and success in entrepreneurial bids..
- Suggestion that REF impact is also a measure of this agenda.
- Survey industry to obtain their perspective on how they feel they have had engagement from the universities.
- Suggestion that this could be informed and align to the pan-Wales 'BeTheSpark' programme of change.
- Recognise that civic engagement is difficult to measure but have been asked to capture this in fee and access plans. Noted HE-BCI doesn't capture all civic engagement.
- Positive response to HEFCW's Innovation Nation publication which captured qualitative aspects of this agenda.

Q7 What should we measure in the context of research and how?

- REF is widely understood and well-established. Recommend retaining this. One institution noted the absence of research impact in the proposed list of indicators. One institution noted the need to acknowledge research excellence wherever found even when in relatively low volume.
- General support for the proposed basket of indicators, with a few points of query, including whether these favour larger institutions.

- May need more elaboration on bibliometric indicators (which ones, how often?)
Note that these don't cover performance in Arts and Humanities. Any bibliometric indicators should be appropriately inclusive. Commercialisation of research is also missing from the list of proposed indicators.
- Query about the focus on research income from Research Councils. Research Council bodies would need to be defined, which bodies and the level of engagement. Contract research has not been included here.
- Disagreement with using QR funding as a measure. REF Volume measures are tied to funding available. Outputs would need to be measured in relation to volume of activity; research income as a measure of efficiency of QR use, eg research income leverage.
- Measure could be PhD awards in comparison to PGR funding received; alternative means of capturing collaborative PGR, through Marie Skłodowska-Curie actions, charitable sources (eg Leverhulme) and ESF funded provision. Could also measure bespoke joint industrial PhDs funded through industrial agreements.
- Including doctoral research could be problematic as EPSRC has indicated how many universities can apply, so not reflective of success in open competition.
- Measures should be broader than Sêr Cymru, eg other pan Wales projects (KESS, Crucible etc) or involvement in other UK initiatives (Rutherford, Newton). Case studies would be helpful.
- Query whether the output measures are simply about volume.
- Could include more on innovation and engagement in these measures, eg number of staff involved in innovation and knowledge transfer activity; membership of professional and industry bodies involved in innovation and KT activity; Additional outputs could include innovation and knowledge transfer income, eg through structural and investment funds, number of research degrees awarded other than PhDs, such as MPhil and MRes.
- Question whether wider consideration should be given to understanding Declaration on Research Assessment [DORA](#) and the [Leiden Manifesto for Research Metrics](#) for example.

Q8 What are your comments on other measures which are monitored including those which are part of the Quality Assessment Framework.

- There is some difficulty in using financial indicators which are comparative to the UK when the funding regime and policy priorities are different.
- Measures of financial health would be preferable such as EBITDA (earnings before interest, taxes, depreciation and amortization).
- Use of Estates Management data would be broadly consistent with many of the environment indicators in Future Generations.
- There will be industry-standard measures for decarbonisation and we should fall in line with those, particularly where universities share resources with other bodies, eg hospitals.
- VC salaries are not measures of performance.

- One institution did not support the inclusion of measures related to reconfiguration.
- One drew attention to the mapping of financial targets against future generations objectives.
- Concerned at possibility of FAPS being kept in place in addition to outcome agreements in context of PCET developments.
- Note that measures in HEFCW's Strategic Equality Plans would align with institutional plans.
- Clarification is required as to how the QAF data would be used in Institutional Risk Review.

Q9 Are there any other areas of data which we have missed?

- Volunteering.
- Need comparability beyond Wales whilst recognising the responsibility to Wales.
- The range of measures considered in the consultation is broad, it will be important to focus. Such a range of measures would be burdensome for institutions to collect and some are in areas over which HEFCW has little control. Could lead to a lack of focus and clarity on what is actually being considered and measured.

Q10 Do you have any comments on how the measures might be used?

- One institution pointed out a fundamental incompatibility between having national measures and testing individual institutions against them. This is incompatible with institutional autonomy. Institutions should only be tested against their own targets and outcomes (including those agreed with HEFCW through the FAP) not national measures.
- Measures could appear differently in sector level basket of measures and individual institutions planning, with each entry having a different value of threshold.
- Welcome for a dashboard approach.
- Measures should be clear, well-defined and benchmarked, and comparable with institutions across the UK.
- Welcome efforts to combine reporting through different HEFCW mechanisms.
- One suggestion would be to separate out approval of fee levels from other processes of monitoring.
- Support HEFCW in intention to ensure universities can demonstrate their value and contribution to a wider audience but that mechanism might not be the same as one to monitoring key areas of HE policy.
- Measures would need to be tailored to meet different purposes and audiences and we would need to be clear how they were going to be used.

Q11 How might we better collate the measures into a more strategic approach to monitoring, minimising burden?

- HEFCE Annual Provider Review is a helpful model.
- Need better alignment with FAPs. Welcome HEFCW work on alignment.
- Include measures already collated and returned by institutions
- Collect data from published sources, but recognise that this is only valid at the time of collection.
- Should impact assess any additional requirements.
- Provide an opportunity to give contextual information
- Reducing elongated processes, with multiples users and systems will reduce chances of error.
- Suggest a template for all institutions with specific measures.
- Should be used in context of institution's strategic priorities. They should not be treated as equally important for all institutions.
- Suggest HEFCW objectives to meet Welsh Government priorities should be targeted at sector level, allowing diversity at individual institution level.
- Measures may be used by a variety of audiences. Individual institutional measures will need to be benchmarked.
- Welcome work with other bodies on KEF, TEF and REF2021.

Q12 What measures should be prioritised in order to ensure a manageable number?

- Widening access and skills, since these align with WG economic and prosperity strategies
- Those that have multi-used benefits, support progress against identified priorities, can be used to give early indication of emerging issues, and have robust datasets underpinning them.
- Those that support outcomes to the student population.
- Those with greater impact on students, widening access, overall student numbers, recruitment and retention, part-time and full-time measured separately, quality and employment.
- Only those which are significant in terms of HE/Welsh Government priorities.
- Five areas covered in the document. The contribution of each HEI will differ according to mission.
- Part-time students, Welsh medium, retention, employment.
- There should be fewer more focussed measures. Perhaps two measures for each strategic area. Measures should be nationally consistent.
- POLAR, NSS, DLHE/GOS and QA outcomes

HEFCW Corporate Strategy 2013-17 - Target outcomes

T1. Widening Access

A rise in the proportion of all Welsh domiciled students studying higher education courses at higher education institutions and further education institutions in Wales who are domiciled in the bottom quintile of wards in the Welsh Index of Multiple Deprivation or in Communities First cluster areas, from 20.0% in 2011/12 to 22.4% in 2015/16 (a rise of 11.8%)

T2. Participation

An increase in the proportion of all UK domiciled students studying higher education courses at higher education institutions and further education institutions in Wales who are from UK low participation areas from 33.2% in 2011/12 to 35.3% in 2015/16 (a rise of 6.3%).

T3. Retention

*(a) A decrease in the percentage of full-time undergraduate students no longer in higher education following year of entry from 9.2% in 2011/12 to 8.2% in 2015/16 (a drop of 10.7%); and
(b) a decrease in the percentage of part-time first degree students no longer in higher education two years following year of entry from 33.7% in 2011/12 to 30.1% in 2015/16 (a drop of 10.7%).*

T4. Part-time

The percentage change in the number of part-time students attending higher education courses in Welsh higher education institutions and further education institutions to be equal to, or greater than, the comparable figure for the UK.

T5. National Student Survey

The three year rolling average score for Wales in the National Student Survey 'overall satisfaction' question will be equal to, or greater than, the comparative score for the UK.

T6. Welsh Medium

The number of students studying higher education courses at Welsh higher education institutions and further education institutions in Wales undertaking at least 5 credits of their course through the medium of Welsh, per annum, will rise from 4,335 in 2011/12 to 5,600 in 2015/16, including a rise from 2,269 to 3,030 in the number of those studying at least 40 credits per annum.

T7. Overseas Students

The percentage change year on year in the number of overseas students attending higher education courses in Welsh higher education institutions will be equal to, or greater than, the comparable figure for UK higher education institutions (excluding London and the South East).

T8. Quality

All institutions being reviewed in the Corporate Strategy period to meet the UK thresholds for quality and standards in the QAA Institutional Review

T9. Initial Teacher Training

Welsh Government intake targets for ITT undergraduate primary, postgraduate primary, undergraduate secondary, postgraduate secondary priority and postgraduate secondary other subjects to be met annually.

T10. Employment

The proportion of leavers from Welsh higher education institutions obtaining undergraduate qualifications who were employed, studying or both six months after leaving will be equal to, or greater than, the UK proportion. HEFCW Corporate Strategy 2013-14 – 2015-16.

T 11 Employability

The proportion of leavers who were working or working and studying who were working in a managerial/professional job six months after leaving to rise from 67.5% in 2010/11 to 72.7% in 2015/16 (a rise of 7.7%).

T12. Continuing Professional Development

The total number of learners day delivered by Welsh higher education institutions for continuing professional development will rise from 202,498 in 2011/12 to 226,000 in 2015/16 (a rise of 11.6%).

T13. Collaborative Research Income

The total amount of income from collaborative research involving both public funding and funding from business will rise from £65,253k in 2011/12 to £72,000k in 2015/16 (a rise of 10.3%).

T14. Research Council Income

The annual percentage change in income from Research Councils will exceed the comparable figure for UK higher education institutions (excluding the 'golden triangle' of Oxford, Cambridge and London).

T15. Research Excellence Framework

An increased proportion of research submitted to REF by Welsh higher education institutions will achieve 3 and 4* in the Research Excellence Framework 2014 from a baseline of 35% at 3* and 14% at 4* in the 2008 Research Assessment Exercise.*

T16. Reconfiguration and Collaboration

At least 75% of the Welsh higher education institutions to have an annual income in excess of the UK median, with no institution to be in the lower quartile by 2015/16.

T17. Governance

No higher education institution to be classified as 'high risk' in accordance with HEFCW institutional risk review processes.

National measures for higher education performance – initial proposals

Basket A: Increasing widening access and inclusion

WIMD quintiles 1 and 2 (WIMD20 and WIMD40) (new, replacing T1)

UKPI for participation using POLAR and overlaid with mature (as T2).

Recruitment and Retention FT/PT as T3 and split by WIMD (both quintiles)

Part-time recruitment (as T4 – numbers and percentage against UK?)

Equality and Diversity student data (new but already monitored)

Basket B: Improving student experience

NSS (as T5 and possibility of using other measures as in TEF)

Welsh medium (as T6, 5 and 40 credits, percentage and numbers)

Overseas students (as T7, numbers and percentage against UK?)

Percentage of EU/international staff (new)

Students taking up study experiences abroad (split by WIMD) (new)

Transnational education (TNE) Students (new)

Outcomes of external quality reviews (as T8)

OIA Complaints (new but already monitored)

Basket C: Strengthening skills, employability and entrepreneurship

Employment (as T10 – but affected by DLHE changes)

Graduate Employment (as T11 – but affected by DLHE changes)

Higher Education – Business and Community Interaction (HE-BCI Survey – CPD measure)

Basket D: Broadening Innovation and Engagement

From the Higher Education – Business and Community Interaction (HE-BCI) Survey:

- Total HE-BCI income (collaborative research, consultancy, contract research, CPD, facilities and equipment-related services, IP, regeneration and development);
- Spin outs: new spin-outs and spin-outs still active which have survived at least three years; and
- Start-ups (staff and graduate): new start ups; and start-ups still active which have survived at least three years. (replacing T13)

REF impact outcomes

Industrial Strategy Challenge Fund outcomes

Basket E: Increasing internationally excellent research

Number of researchers (ie staff on research and research & teaching contracts) – STEM and non-STEM

PGR student numbers

Numbers of PhDs awarded

PhD completion rates (proportion completing within four years for full-time students, and the equivalent for part-time)

Research income (Research Council and total)

Bibliometric indicators (HEFCW to commission data periodically from specialist consultants)

REF outcomes.

Basket F: Other measures to be monitored

Financial Health

Estates (including carbon efficiency measures)

Senior staff pay and gender pay gap

Equality and diversity staff data